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January 10, 2013

VIA ELECTRONIC FILING

Marlene Dortch Secretary Federal Communications Commission 445 12th St. SW Washington, D.C. 20554

Re: Notice of Ex Parte Communication, 2010 Quadrennial Regulatory Review

- Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 09-182; Promoting Diversification of Ownership in

the Broadcasting Services, MB Docket No. 07-294

Dear Ms. Dortch:

On January 8, 2012, Kenneth Satten and the undersigned, representing Bonneville International Corporation and The Scranton Times, L.P. ("Bonneville/Scranton"), met with Sarah Whitesell, Hillary DeNigro, Martha Heller, Brendan Holland, and Jamila-Bess Johnson of the Commission's Media Bureau. The purpose of the meeting was to discuss the rulemaking record's continuing justification for eliminating the FCC's newspaper/radio cross-ownership rule and to express support for new and existing efforts to foster greater minority and female ownership.

Specifically, we discussed the results of the latest comment round in the proceeding and pointed out that the record contains no empirical data to substantiate the few generalized claims made about the newspaper/radio rule. In addition, we noted that the record contains widespread agreement that access to capital is the most significant barrier to entry that confronts minorities, women, and other aspirants hoping to own broadcast stations. We urged that the Commission focus its efforts on initiatives designed to help open greater access to financing and operational support, consistent with the suggestions set forth in our latest comments in the proceeding. *See* Reply Comments of Bonneville/Scranton, MB Docket No. 09-182, et al, at 13-14 (filed Jan. 4, 2013).

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In accordance with the Commission's *ex parte* rules, 47 C.F.R. § 1.1206, this notice is being filed in the above-referenced dockets. If you have any questions about this submission, please do not hesitate to contact me.

Respectfully submitted,

__/s/ Rosemary C. Harold_ Rosemary C. Harold Wilkinson Barker Knauer, LLP 2300 N Street, N.W, Suite 700 Washington, D.C. 20037 (202) 383-3371

Counsel for Bonneville International Corporation and The Scranton Times, L.P.

cc: Sarah Whitesell Hillary DeNigro Martha Heller Brendan Holland Jamila-Bess Johnson